

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

ANGELA ENGLE HORNE,

Plaintiff,

v.

Civil Action No. 3:16cv92

WTVR, LLC, d/b/a CBS 6,

Defendant.

**DEFENDANT'S UPDATED WITNESS AND EXHIBIT LISTS**

NOW COMES Defendant, WTVR, LLC, d/b/a CBS 6, by counsel, and sets forth its Updated Witness and Exhibit Lists in this matter as follows:

Witness List

Defendant may call any of the following witnesses to testify in this matter:

- (a) Wayne Covil (liability)
- (b) Stephen Hayes (liability)
- (c) Sheryl Barnhouse (liability/damages)
- (d) Scott Wise (liability)
- (e) Michael Bergazzi (liability)
- (f) Misty Davidson (liability)
- (g) Bobby Browder (liability)
- (h) Angela Horne (by deposition) (liability/damages)

Exhibit List

Defendant may offer into evidence at trial any of the following exhibits:

- | <u>Exh.</u> | <u>Description</u>  |
|-------------|---|
| 1.          | Video of broadcast  |
| 2.          | Transcript of broadcast   |
| 3.          | Website version of broadcast  |
| 4.          | February 13, 2015 email from ssssmith869@yahoo.com to Wayne Covil re: anonymous letters sent to school board members re: hiring of a convicted felon by school board  |
| 5.          | Va Code § 22.1-296.1  |
| 6.          | Prince George County Public Schools Policy re: Personnel Records  |
| 7.          | Cover/excerpt from 2006 edition of the Virginia School Law Deskbook (attached as Exhibit 3 to Defendant's Reply Memorandum in Support of Motion for Summary Judgment)   |
| 8.          | 07/01/14 Superintendent's Contract by and between Prince George County School Board and Bobby R. Browder  |
| 9.          | 03/05/15 Prince George Journal article  |
| 10.         | FBI report  |
| 11.         | Defendant reserves the right to use images from the broadcast as demonstrative exhibits, including those attached as Exhibits 1, 2, and 4 from Defendant's Reply Memorandum in Support of Motion for Summary Judgment |
| 12.         | Defendant reserves the right to use medical records (excluding pharmacy bills) produced by Plaintiff for the purposes of impeachment if necessary   |
| 13.         | 02/08/15 Letter from Angela Horne (subject to the Court's further ruling)   |
| 14.         | All unobjected to exhibits on Plaintiff's Exhibits List   |
| 15.         | Any documents introduced as exhibits in deposition testimony designated by Defendant  |

Defendant reserves the right to rely upon additional documents and pleadings for purposes of rebuttal or impeachment.

Dated: April 6, 2017

Respectfully submitted,

/s/

Conrad M. Shumadine (VSB No. 4325)  
Brett A. Spain (VSB No. 44567)  
Counsel for WTVR, LLC, d/b/a CBS 6  
WILLCOX & SAVAGE, P.C.  
440 Monticello Avenue, Suite 2200  
Norfolk, Virginia 23510  
(757) 628-5500 Telephone  
(757) 628-5569 Facsimile  
cshumadine@wilsav.com  
bspain@wilsav.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of April, 2017, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

Richard F. Hawkins, III (VSB No. 40666)  
Counsel for Plaintiff  
The Hawkins Law Firm, PC  
2222 Monument Avenue  
Richmond, Virginia 23220  
(804) 308-3040 Telephone  
(804) 308-3113 Facsimile  
rhawkins@thehawkinslawfirm.net

/s/

Conrad M. Shumadine (VSB No. 4325)  
Brett A. Spain (VSB No. 44567)  
Counsel for WTVR, LLC, d/b/a CBS 6  
WILLCOX & SAVAGE, P.C.  
440 Monticello Avenue, Suite 2200  
Norfolk, Virginia 23510  
(757) 628-5500 Telephone  
(757) 628-5569 Facsimile  
cshumadine@wilsav.com  
bspain@wilsav.com